

AKIN GUMP STRAUSS HAUER & FELD LLP
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Michael S. Stamer (MS-4900)
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : **Chapter 11 Case No.**
: **Case No. 08-13555 (JMP)**
: **(Jointly Administered)**
-----x
Lehman Brothers Holdings Inc., et al. :
Debtors. :
-----x

**FIRST AMENDED VERIFIED STATEMENT OF
AKIN GUMP STRAUSS HAUER & FELD LLP
PURSUANT TO BANKRUPTCY RULE 2019**

MICHAEL S. STAMER, being duly sworn, deposes and says:

1. I am an attorney at law and a partner in the law firm of Akin Gump Strauss Hauer & Feld LLP (“Akin Gump”), which firm serves as counsel to an informal noteholder group (the “Informal Noteholder Group”) consisting of certain unaffiliated holders of senior notes (the “Senior Notes”) issued by Lehman Brothers Holdings Inc. (together with its related subsidiaries and affiliates, the “Debtors”). I am the attorney at Akin Gump responsible for this engagement and have knowledge of Akin Gump’s representation of the Informal Noteholder Group in these chapter 11 cases. I make this amended verified statement on behalf of Akin Gump in accordance with Rule 2019 of the Federal Rules of Bankruptcy Procedure.

2. The members of the Informal Noteholder Group are:

Blue Ridge Capital
660 Madison Avenue, 20th Floor
New York, NY 10065

Capital Guardian Trust Company
11100 Santa Monica Boulevard, 15th Floor
Los Angeles, CA 90025-3384

Cyrus Capital Partners, L.P.
399 Park Avenue, 39th Floor
New York, NY 10022

Deutsche Bank Securities, Inc.
60 Wall Street, 3rd Floor
New York, NY 10015

King Street Capital Management, L.L.C.
65 East 55th Street, 30th Floor
New York, NY 10022

Longacre Management, LLC
810 Seventh Avenue, 33rd Floor
New York, NY 10019

New York Life Investment Management LLC
51 Madison Avenue, Room 201
New York, NY 10010

Owl Creek Asset Management, L.P.
640 Fifth Avenue, 20th Floor
New York, NY 10019

PPM America, Inc.
225 W. Wacker Drive, Suite 1200
Chicago, IL 60606

Principal Global Investors
191 N. Wacker Drive, Suite 1601
Chicago, IL 60606

Standard General
650 Madison Avenue, 26th Floor
New York, NY 10022

Tricadia Capital Management LLC
767 Third Avenue, 11th Floor
New York, NY 10024

Varde Partners Inc.
8500 Normandale Lake Boulevard, Suite 1570
Minneapolis, MN 55437

Western Asset Management Company
385 East Colorado Boulevard
Pasadena, CA 91101

3. Akin Gump has been advised by the members of the Informal Noteholder Group that, as of the date hereof, they collectively are the beneficial owner of, or the holder or manager of various accounts with investment authority, contractual authority or voting authority over, more than \$2.6 billion principal amount of Senior Notes.

4. Akin Gump may also represent or advise, or may have represented or advised, other parties in interest with respect to the Debtors' chapter 11 cases that have not been included in this statement because the parties that Akin Gump represents do not currently intend to appear in these cases or such representations have been concluded. These parties in interest may include commercial and investment banks, private equity and hedge funds, and other financial institutions, exchanges, and clearing organizations.

Dated: New York, New York
December 15, 2008

AKIN GUMP STRAUSS HAUER & FELD LLP

By: /s/ Michael S. Stamer
Michael S. Stamer
One Bryant Park
New York, New York 10036
(212) 872-1000 (Telephone)
(212) 872-1002 (Facsimile)

Sworn to before me this
15th day of December, 2008

/s/ Mildred Andino
Notary Public, State of New York
No. 01AN4857026
Qualified in Queens County
Certificate Filed in New York County
Commission Expires April 28, 2010